



Florida Department of Environmental Protection

Northwest District
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Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

October 24, 2008

Mr. Joe Wier
McKenzie Tank Lines, Inc.
Post Office Box 1200
Tallahassee, Florida 32302

Dear Mr. Wier:

This letter is regarding the May 20, 2008 Response to Comments Report prepared by Geovac Environmental Services, Inc. for the McKenzie Tank Lines, Inc., facility (COM_68413) located at 2778 West Tharpe Street, Tallahassee, Leon County, Florida. The report was submitted in response to our March 27, 2008 letter requesting an Interim Source Removal Report (ISRR) Addendum to include additional information with regards to the site assessment activities in the West Drum Accumulation Area Cleanup Project.

Upon review, we find the assessment of the West Drum Accumulation Area to be incomplete. Additional assessment is needed to determine the vertical and horizontal extent of Chromium at the DW-E-1 soil sample location. Results from this assessment with conclusions and recommendations for corrective actions should be submitted as a Site Assessment Report (SAR) Addendum.

For additional information, please refer to the enclosed review memorandum.

Unless notified otherwise, we look forward to receiving your SAR Addendum no later than December 31, 2008. If you have any questions, please contact Julie Ann Hardy, Project Manager, at (850) 595-8360, extension 1211 or by e-mail at julie.hardy@dep.state.fl.us.

Sincerely,

Alex Webster, P.G.
Brownsfield Coordinator

AW:jhr

Enclosure: Review Memorandum dated October 21, 2008
cc: John M. Elrod, P.G., Geovac Environmental Services, Inc. w/enclosure
Jim Byer, FDEP w/enclosure

Memorandum

Florida Department of Environmental Protection

TO: Alex Webster, P.G. *AW*

FROM: Julie Ann Hardy *JAH*

DATE: October 21, 2008

SUBJECT: McKenzie Tank Lines May 20, 2008 Response to Comments Report (West Drum Accumulation Area)

I have reviewed the report submitted by Geovac Environmental Services, Inc. (Geovac), on behalf of McKenzie Tank Lines, Inc., located at 2778 West Tharpe Street, Tallahassee, Leon County, Florida. The report was submitted in response to our March 27, 2008 requesting an Interim Source Removal Report (ISRR) addendum to include additional information with regards to the site assessment activities in the West Drum Accumulation Area.

In a follow up letter dated April 25, 2008, we had separated the East Drum Accumulation Area and the West Drum Accumulation Area cleanup projects and requested a site assessment report be submitted for the West Drum Accumulation Area. Upon review of the May 20, 2008 report, it does not appear that the vertical and horizontal extent of impacted soils at the DW-E-1 location has been adequately delineated; therefore, the site assessment in the West Drum Accumulation Area remains incomplete.

In our March 27 letter, we had noted that soil samples collected in August 2007 from the Drum 76 location and the Wash Rack Drum location had exceeded the groundwater leachability soil cleanup target levels (SCTLs) for total recoverable petroleum hydrocarbons (TRPHs). Samples collected on this same date from the Wash Rack Drum location had also exceeded the groundwater leachability SCTL for Barium and Chromium. We had requested that the vertical and horizontal extent of soil contamination in the Drum 76 and Wash Rack Drum location be determined and recommendations for corrective actions be provided in an ISRR Addendum.

On April 22, 2008 soil samples were collected from the areas of concern. A sample was collected at 1.5 ft bls near the original Drum 76 location (collected at 1 ft bls). Analytical results indicate TRPH was below the SCTL criteria. Four samples were collected from the Wash Rack Drum area: DW-E-1, DW-C-1, DW-C-3, and DW-W-1. These samples were analyzed specifically for barium and chromium using EPA Method 6010B. The sample collected from the DW-C-3 location was also analyzed for TRPH. Analytical results show that TRPH concentrations at the DW-C-3 location were below the 340 mg/Kg groundwater leachability SCTL. The consultant indicates that the TRPH

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identified in the August 2007 sampling event was a result of asphalt chips inadvertently impacting the soil sample. Based on the results from the confirmation sample, this appears reasonable.

However, analytical results from the Wash Rack Drum Area samples collected on April 22, 2008 show exceedances of the groundwater leachability SCTL for chromium at the DW-E-1 location. According to the Soil Sampling Location Map (Figure 2), DW-E-1 is located east of the other samples collected in the Wash Rack Drum Area. Therefore, additional assessment is needed to determine the vertical and horizontal extent of metals at the DW-E-1 location. Results from this assessment should be submitted in a SAR Addendum. In addition, appropriate conclusions and recommendations for corrective actions should also be included in the SAR Addendum.

The following information requested in our March 27, 2008 letter **was** included in the May 20, 2008 report:

1. A Soil Sampling Location Map scaled to adequately depict the soil sampling locations;
2. Groundwater Sampling Log for the January 31, 2008 sampling of well, MW-2D;
3. Laboratory Analytical Data for groundwater collected from MW-2D on January 31, 2008; and
4. Laboratory Analytical Data from the January 31, 2008 soil sampling event.

JAH:jh